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June 23, 2006

Via CM/ECF & Hand-Delivery

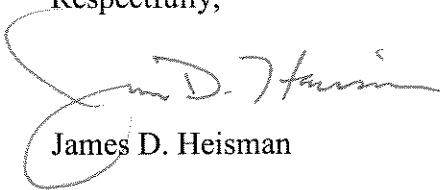
The Honorable Kent A. Jordan
 U.S. District Court for the District of Delaware
 844 N. King Street
 Lock Box 10
 Wilmington, DE 19801

RE: ***St. Paul Travelers Companies, Inc., et al. v. Walpar, Inc. and Daisy Construction Co. v. Specialty Service Contractors, Inc.***
C.A. No. 05-880 (KAJ)

Dear Judge Jordan:

I write to clarify statements made in Mr. Beste's letter to Your Honor dated June 22, 2006. Mr. Beste's statement that the "Order has been approved by all current counsel of record" does not refer to me. In fact, I had not seen the proposed scheduling order until it was served via CM/ECF. As Your Honor is aware, my client, Specialty Service Contractors, Inc., was just recently served and its responsive pleading is due July 24, 2006. Accordingly, in the absence of the agreement of counsel, I will be prepared to present my client's position with respect to the issues to be addressed in the scheduling order during the July 6, 2006 teleconference.

Respectfully,


 James D. Heisman

xc: Kevin W. Goldstein, Esq. (via CM/ECF)
 Robert K. Beste, Jr., Esq. (via CM/ECF)
 Gary W. Aber, Esq. (via CM/ECF)
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